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STATE OF MARYLAND * NO. C-10-CR-23-000608
v. * IN THE CIRCUIT COURT FOR
CHELSEA ELIZABETH PHOENIX * FREDERICK COUNTY, MD

* * * * *

STATE'S PETITION TO REVOKE BOND AND REQUEST FOR WARRANT

COMES NOW, the State of Maryland, by and through Lindsey M. Carpenter, Assistant State's Attorney for Frederick County, Maryland, and pursuant to Maryland Rule 4-216.3(d) moves this Honorable Court to revoke the Defendant's bond in the above-captioned case, for the following reasons:

1. On June 6, 2023 the Defendant was charged with Second Degree Rape and Third Degree Sexual Offense involving a 12 year old victim.
2. On June 9, 2023 the Defendant was released on her own recognizance and placed on pre-trial supervision through the Frederick County Sheriff's Office.
3. The Defendant was ordered to have no contact with any minors as a condition of her release.
4. Since the Defendant's release, she has sent numerous messages via social media to minors. Two of those individuals are 13 years old. The messages sent by the Defendant include requests to meet up with the minors, and several are flirtatious in nature.
5. The State further has learned that the Defendant had a minor over at the residence where she is currently residing.
6. On June 27, 2023 the State filed a Motion to Revoke Bond in the District Court.
7. At a motion hearing on June 28, 2023, the condition of pre-trial supervision was struck as the Frederick County Sheriff's Office cannot provide pre-trial supervision in this case due to the nature of the charges. The Court did not hear the State's Motion to Revoke at that time. No other changes to the Defendant's bond status occurred at that time.

8. The Defendant was notified on June 28, 2023 regarding the evidence that the State obtained through her social media accounts of her violations of bond conditions. Immediately after the hearing, the Defendant changed her passwords as to not allow her accounts to be monitored by her father anymore.

9. The bond revocation hearing was scheduled to be heard in the District Court on July 5, 2023, however the Defendant was indicted by the grand jury on June 30, 2023.

10. The Defendant continues to have contact with minors, similar in age and gender to the minor victim in this case, in direct violation of her release conditions. Additionally, the State has no way to monitor the Defendant's compliance with her bond conditions as pre-trial supervision was struck, and she changed her passwords.

11. The State believes that the Defendant is a danger to the public, and specifically to minors.

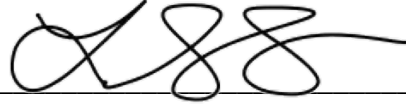
WHEREFORE, as the Defendant has violated her pretrial release conditions by having contact with minors the State respectfully requests this Honorable Court issue a warrant and revoke the Defendant's bond.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of July, 2023, a copy of the foregoing State's Petition to Revoke Bond and Request for Warrant was sent via first class mail to the defendant at 12370 Quail Woods, Germantown, MD 20874.

A handwritten signature in black ink, appearing to read 'LSC', is written over a horizontal line.

LINDSEY M. CARPENTER